

IN RE: HAMILTON CLARK CONNOR, III : CHAPTER 13
and VIOLET F. CONNOR :
Debtors :
 :
JACK N. ZAHAROPOULOS :
STANDING CHAPTER 13 TRUSTEE :
Movant :
 :
vs. :
 :
HAMILTON CLARK CONNOR, III :
and VIOLET F. CONNOR :
Respondents : CASE NO. 5-23-bk-02216

- b. The plan fails to provide that the sale or refinance of debtors' real estate will occur within six (6) months.
- c. Secured claims not in plan. (Claim #4 and Claim #8 arrears.)

4. Trustee avers that debtors' plan cannot be administered due to the lack of the following:

- a. Six-month Profit and Loss Statement for April through September, 2023.

WHEREFORE, Trustee alleges and avers that debtors' plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 9th day of November, 2023, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Philip Stock, Esquire
706 Monroe Street
Stroudsburg, PA 18360

/s/Deborah A. DePalma
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee